

MAR 23

CLERK, U.S. DISTRICT COURT
NORTH DAKOTA

2:18mj166

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT.

I, Gerren K. Stith being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the United States Capitol Police (USCP), where I have served since October 2009. I am currently assigned to the Investigations Division, Threat Assessment Section. My duties and responsibilities, among other things, include investigating threats made to federal officials. I have attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have received training and gained experience in search warrant and arrest warrant applications. I have participated in numerous investigations into threats against members of Congress to include violations of Title 18, United States Code, Section 115(a)(1)(B).

2. The facts set forth below are based upon my own observations, investigative reports and information provided to me by other law enforcement agents or witnesses. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

RELEVANT STATUTE

3. Title 18, United States Code, Section 115(a)(1)(B), states that "[w]hoever threatens to assault, kidnap, or murder, a United States official . . . with intent to impede, intimidate, or interfere with such official . . . while engaged in the performance of official duties, or with intent to retaliate against such official . . . on account of the performance of official duties, shall be" guilty of an offense against the United States.

4. The term "United States official," under Title 18, United States Code, Section 115(c)(4), means, among other things, "a Member of Congress."

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PROBABLE CAUSE

5. On or about March 22, 2018, **Wallace GODWIN** visited the Virginia Beach, Virginia District Office of Congressman S.T. and threatened to murder and assault the Congressman and two members of his staff.

6. On March 22, 2018, at approximately 1:30 p.m., **GODWIN** stated substantially the following to a staff member for Congressman S.T. after apparently becoming frustrated during a discussion about marijuana policy: "Scott is having an event this Saturday. I am going to get my shotgun and do something about this. I will just handle this myself." **GODWIN** then pointed at two staffers in the room and stated, "You two are next." Congressman S.T. was not present when these events occurred.

7. Your affiant has confirmed with Congressman S.T.'s staff that the Congressman plans on attending multiple public functions on Saturday, March 24, 2018.

8. Your Affiant searched law enforcement databases of **GODWIN** and it was revealed that **GODWIN** has a concealed weapon permit.

9. Your affiant was advised by the Congressman's staff that in 2017, **GODWIN** went to Congressman S.T.'s private residence, blocked the Congressman's vehicle with his own vehicle, and waited for the Congressman to come outside. The Congressman left his residence and told **GODWIN** to move his vehicle. **GODWIN** then exited the vehicle to speak to the Congressman about marijuana policy. The Congressman told **GODWIN** to leave and **GODWIN** left the residence without further incident.

10. On or about March 8, 2017, **GODWIN** was reported to the United States Capitol Police following a visit to the Virginia Beach District Office of Congressman S.T.

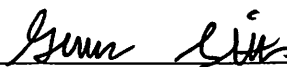
Congressional Staff reported that **GODWIN** visited the Virginia Beach office, leaned over the reception desk, and began to yell at staff in an aggressive manor frightening to the staff.

CONCLUSION

11. Based upon the above information, there is probable cause to believe that **Wallace GODWIN** did, on or about March 22, 2018, threaten to murder and assault a United States official, with the intent to impede, intimidate, or interfere with such official while engaged in the performance of official duties, or with intent to retaliate against such official on account of the performance of official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

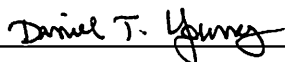
12. I therefore ask that an arrest warrant be issued for **Wallace GODWIN**.

Further, your affiant sayeth naught.



Special Agent Gerren K. Stith
United States Capitol Police

READ AND REVIEWED:



Daniel T. Young
Assistant United States Attorney

Sworn and subscribed to before me this 23rd day of March, 2018



UNITED STATES MAGISTRATE JUDGE

At Norfolk, Virginia